

To: szwerner@bullwinkle.ucdavis.edu
From: rwoodard@goldeneye (Rick Woodard)
Subject: Comments on CALFED Draft Component Report
Cc:
Bcc: Howe_Carol
X-Attachments:

Inge: Thanks for the comments. Here is a preliminary response to some of the issues you raised.

1. I don't recall that it was said in our August 6 meeting that ozonation and filtration are too expensive. John Gaston, a consultant with CH2M Hill who is working for CALFED, provided an off the cuff cost figure, but I thought I recalled that he was talking about installation of Granular Activated Carbon facilities. Anyway, your point is well taken. All of the municipal utilities taking water from the Delta already employ filtration, as required by current regulations. Many, if not most of the larger utilities using Delta water are also in the process of moving to ozone. Therefore, it is certainly the case that these forms of treatment are not too expensive to be used.

You are also quite correct in suggesting that research on ozonation byproducts is ongoing, and that technological improvements can be anticipated. Over the last two years, the Journal of the American Water Works Association has been a particularly rich source of information on current treatment research activities. The U.S. EPA and the AWWA Research Foundation are providing direct support for a number of significant research activities that should help develop the needed technologies. Though promising research is ongoing, I believe it is still true as of today that the presence of bromide in drinking water supplies does present special treatment challenges, and that not all of the technological answers are in hand.

The choice of a Delta alternative will not be based on a unidimensional analysis of cost of facilities versus cost of treatment. Indeed, there are many considerations involving ecosystem restoration and health, system integrity, and water quality. An environmentally superior alternative cannot be rejected on the basis of cost alone, and will not be so rejected within the CALFED process. Rather, the alternative that is chosen will be the best balance of all competing needs.

2. I agree CALFED should support development of bioassays using resident species, in addition to the standard three species test.

3. The target ranges for bioaccumulating pollutants will be taken into account to the extent that we can provide adequate scientific support for the targets. I am sure you would agree that successful extrapolation of environmental concentrations to tissue concentrations is very difficult in most cases. I believe that, as part of our adaptive management approach, we should be engaging in studies designed to enable us to better understand bioaccumulation phenomena affecting the species in the Bay-Delta estuary.

Finally, you asked whether it is acceptable for you to send your comments to me. Of course that is just fine.

Thank you very much, Inge, for sacrificing your time to attend the August 6 meeting of the Water Quality Technical Group. I have badly wanted to have broader participation of environmental advocacy groups in this effort, and really appreciate your helping us to realize this goal. Also, thank you for your thoughtful comments. They will be considered in developing our future work products.

Best regards,
Rick